

# EXHIBIT A

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**Subject:** FWC - Challenge (2) to "Confidential" Designations  
**Date:** Thursday, August 3, 2023 at 11:00:59 AM Eastern Daylight Time  
**From:** Corey Stern  
**To:** Michael A. Olsen, Jim Campbell  
**CC:** Melanie Daly, Ted Leopold, Jordan Connors, Steve Morrissey, Paul Novak, Hunter Shkolnik, Patrick Lanciotti, Hunter Shkolnik, Richard Kuhl, Margaret Bettenhausen, TMendel, Bill Kim, Sheldon Klein, Rick Berg, Wayne B. Mason, David C. Kent, Philip Erickson, Susan Smith, Brian MacDonald, Todd Weglarz, Donald Dawson, Michael L. Williams, Eric A. Rey, Alaina Devine, Kristin M. Dupre, Richard P. Campbell, Andreas Ringstad, Jack J. O'Donnell, John R. Penhallegon, Chris Muha, Christopher R. Howe, Christopher D. Fletcher, William C. Cahill, Kelly Kramer, Kristin Silverman, Mark Ter Molen, William Sinnott, Minh Olivier Nguyen-Dang, Chris Weld, Thompson, Craig S., travis.gamble@faegredrinker.com, vance.wittie@faegredrinker.com, Moshe S. Maimon, Jerome Block  
**Attachments:** 2023.08.03 Letter to Veolia (2nd Confidential Designations) [38].pdf

Counsel for Veolia –

Please see correspondence attached related to the above-referenced matter.

Best,

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August 3, 2023

**VIA EMAIL & CERTIFIED MAIL (RRR)**

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**RE: IN RE FLINT WATER CASES – PRODUCTION OF DOCUMENTS**  
**CHALLENGE (2) TO “CONFIDENTIAL” DESIGNATIONS**

Mr. Campbell, Mr. Olsen:

Please be advised that pursuant to the Court's Confidentiality Order,<sup>1</sup> Plaintiffs hereby formally challenge the "Confidential" and "Highly Confidential – Attorneys' Eyes Only" designations of the following documents:

1. VWNAOS448563-  
VWNAOS448564
2. VWNAOS222380-  
VWNAOS222381
3. VWNAOS222385-  
VWNAOS222386
4. VWNAOS332242-  
VWNAOS332243
5. VWNAOS526512-  
VWNAOS526512.0001
6. VWNAOS526544-  
VWNAOS526544.0001
7. VWNAOS526894-  
VWNAOS526894.0006

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<sup>1</sup> See Case No. 16-cv-10444 (ECF. No. 1255-3).

8. VWNAOS526900-  
VWNAOS526900.0009
9. VWNAOS332516-  
VWNAOS332516.0003
10. VWNAOS260180-  
VWNAOS260180.0004
11. VWNAOS388021
12. VWNAOS388031
13. VWNAOS543269
14. VWNAOS259130
15. VWNAOS543748-  
VWNAOS543752
16. VWNAOS556630-  
VWNAOS556630.0002
17. VWNAOS494815-  
VWNAOS494827
18. VWNAOS494840-  
VWNAOS494852
19. VWNAOS329070-  
VWNAOS329071
20. VWNAOS329074-  
VWNAOS329075
21. VWNAOS543234-  
VWNAOS543235
22. VWNAOS543243-  
VWNAOS543244
23. VWNAOS543245-  
VWNAOS543246
24. VWNAOS543249-  
VWNAOS543250
25. VWNAOS543251-  
VWNAOS543253
26. VWNAOS329211
27. VWNAOS329216
28. VWNAOS329217
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31. VWNAOS329245-  
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32. VWNAOS543688
33. VWNAOS543737-  
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35. VWNAOS323994-  
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- 44. VWNAOS331561-  
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- 45. VWNAOS331569-  
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- 46. VWNAOS007640-  
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VWNAOS525199
- 81. VWNAOS525200-  
VWNAOS525202
- 82. VWNAOS088775-  
VWNAOS088777
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VWNAOS088791
- 84. VWNAOS088792-  
VWNAOS088795
- 85. VWNAOS290752

- 86. VWNAOS372677-  
VWNAOS372680
- 87. VWNAOS372716-  
VWNAOS372719
- 88. VWNAOS372720-  
VWNAOS372723

These documents do not contain private, non-public, confidential, competitively sensitive, or proprietary information not readily ascertainable through lawful means by the public. Furthermore, if any of these documents were to be made public, such would not cause oppression, competitive disadvantage, infringement of privacy rights established by statute or regulation, or infringement of confidentiality requirements established by statute or regulation with respect to government purchasing or other operations.

This letter is a formal demand to withdraw all such designations.

Very Truly Yours,

**LEVY KONIGSBERG, LLP**



Corey M. Stern

*Cc:* (By email only)  
*Theodore Leopold & Jordan Connors (Class Counsel)*  
*Hunter Shkolsnik & Patrick Lanciotti (Co-Liaison Counsel)*  
*Richard Kull & Margaret Bettenhausen (Counsel for the State)*  
*William Kim & Sheldon Klein (Counsel for the City of Flint)*  
*Wayne Mason & David Kent (Counsel for LAN/LAD)*  
*Craig Thompson (Counsel for Rowe)*  
*Susan Smith & Brian MacDonald (Counsel for McLaren)*  
*Todd Weglarz & Donald Dawson (Counsel for certain Legionella Plaintiffs)*  
*Michael Williams & Eric Rey (Counsel for the USEPA)*  
*All Veolia Entities' Counsel of Record or otherwise known*